

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAENEAN LIGON, *et al.*
on Behalf of Themselves and Others
Similarly Situated,

Plaintiffs,

-against-

12 Civ. 2274 (SAS)(HBP)

CITY OF NEW YORK, *et al.*

Defendants.
-----X

**DECLARATION OF J. MCGREGOR SMYTH, JR. IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

J. McGregor Smyth, Jr, ESQ, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

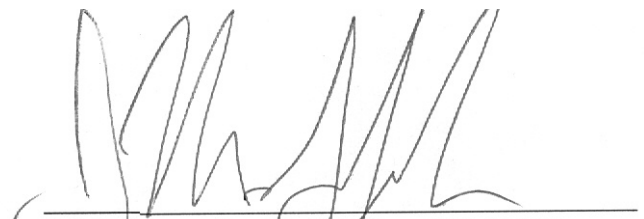
1. I am the Managing Attorney, Civil Practice, at The Bronx Defenders, counsel for the plaintiffs and the putative class in this action. I submit this Declaration in support of plaintiffs' motion for class certification. This Declaration is made upon personal knowledge, except where otherwise noted.

2. The Bronx Defenders is an award-winning legal organization recognized as a "pioneer in holistic advocacy" that provides integrated criminal and civil legal representation and impact litigation. *See, e.g., Casale v. Kelly*, 257 F.R.D. 396, 404, n.40 (S.D.N.Y. 2009). The Civil Practice specializes in comprehensive representation to safeguard the civil rights of indigent New Yorkers charged with crimes.

3. The Bronx Defenders has over a decade of experience successfully litigating federal Section 1983 claims of constitutional violations by police agencies,

including being appointed class counsel in two certified class actions. *See Casale v. Kelly*, 257 F.R.D. 396 (S.D.N.Y. 2009); *Brown v. Kelly*, 244 F.R.D. 222 (S.D.N.Y. 2007).

Dated: November 9, 2012
Bronx, New York



J. McGregor Smyth, Jr., Esq. [JS-9995]
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